

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 5202, 5601, 5617, 5620, 5624, 5626 &
7090

CERTIFICATION OF COUNSEL

I, Kimberly A. Brown, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On December 27, 2023, the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “Motion”).

2. On January 11, 2024, Boba Foundation filed the *Opposition of Boba Foundation to Motion of Debtors to Estimate Claims Based on Digital Assets and Request for Continued Hearing* [D.I. 5601].

3. On January 11, 2024, Fondation Serendipity, Fondation Elements, Serendipity Network Ltd and Liquidity Network Ltd (collectively, “Oxy”) filed the *Preliminary Objection of Fondation Serendipity, Fondation Elements, Serendipity Networks Ltd and Liquidity Network Ltd to the FTX Debtors’ Motion to Estimate Claims Based on Digital Assets* [D.I. 5617].

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. On January 11, 2024, Lavanda Sands L.L.C. (“LS”) filed the *Joinder in Preliminary Objection of Fondation Serendipity, Fondation Elements, Serendipity Networks Ltd and Liquidity Network Ltd to the FTX Debtors’ Motion to Estimate Claims Based on Digital Assets* [D.I. 5624].

5. On January 11, 2024, Maps Vault Limited (“Maps”) filed the *Preliminary Objection of Maps Vault Limited to Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5620].

6. On January 11, 2024, TMSI SEZC Ltd. (“TMSI”) filed the *Limited Objection of TMSI SEZC Ltd. to Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5626].

7. On January 31, 2024, the Court held a hearing (the “Hearing”), and granted the Motion as set forth on the record of the Hearing.

8. On February 7, 2024, the Court entered the *Order Granting Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 7090] (the “Order”), which excluded certain Digital Assets to be valued following further proceedings as set forth in paragraph 9 of the Order (the “Deferred Digital Assets”).

9. The Debtors, Boba Foundation, Oxy, LS, Maps, and TMSI (together, the “Parties”), by and through their respective counsel, have discussed in good faith a schedule with respect to the Deferred Digital Assets, which is memorialized in the *Stipulation and Agreed Scheduling Order* (the “Stipulation”). Attached hereto as Exhibit A is a proposed order (the “Proposed Order”) approving the Stipulation. Attached as Exhibit 1 to the Proposed Order is the Stipulation, as agreed to by and among the Parties.

10. The Parties have no objection to the entry of the Proposed Order. In accordance with the Court’s electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

11. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: February 7, 2024
Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Kimberly A. Brown
Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

*Counsel for the Debtors
and Debtors-in-Possession*